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17 UBER TECHNOLOGIES, INC.
and OTTOMOTTO LLC

18 UNITED STATES DISTRICT COURT
19 NORTHERN DISTRICT OF CALIFORNIA
20 SAN FRANCISCO DIVISION

21 WAYMO LLC,
22 Plaintiff,
23 v.
24 UBER TECHNOLOGIES, INC.,
OTTOMOTTO LLC; OTTO TRUCKING LLC,
25 Defendants.

26 Case No. 3:17-cv-00939-WHA

27
28 **DECLARATION OF IAN M. GORE IN
SUPPORT OF DEFENDANTS'
ADMINISTRATIVE MOTION TO
FILE UNDER SEAL THEIR
STATEMENT RE: INTENT TO USE
LYFT INFORMATION AT TRIAL**

1 I, Ian M. Gore, declare as follows:

2 1. I am an attorney at the law firm of Susman Godfrey L.L.P. I make this declaration
 3 based upon matters within my own personal knowledge and if called as a witness, I could and
 4 would competently testify to the matters set forth herein. I make this declaration in support of
 5 Defendants' Administrative Motion to File Under Seal Their Statement Re: Intent to Use Lyft
 6 Information at Trial.

7 2. I have reviewed the following documents and confirmed that only the portions
 8 identified below merit sealing:

Document	Portions to Be Filed Under Seal	Designating Party
Statement Re: Intent to Use Lyft Information at Trial ("Statement")	Highlighted Portions	Plaintiff (Green)
Exhibits 1, 3, and 4	Entire Documents	Plaintiff

14 3. The green-highlighted portions of the Statement and Exhibits 1, 3, and 4 contain
 15 information that has been designated "Highly Confidential – Attorneys' Eyes Only" or
 16 "Confidential" by Waymo in accordance with the Patent Local Rule 2-2 Interim Model Protective
 17 Order ("Protective Order"), which the parties have agreed governs this case (Transcript of
 18 3/16/2017 Hearing, page 6). Defendants file this material under seal in accordance with
 19 Paragraph 14.4 of the Protective Order.

20 4. Defendants' request to seal is narrowly tailored to the portions of the Statement
 21 and its supporting papers that merit sealing.

22 I declare under penalty of perjury that the foregoing is true and correct. Executed this
 23 23rd day of October, 2017 in New York, NY.

24 _____
 25 /s/ Ian M. Gore
 26 Ian M. Gore
 27
 28

ATTESTATION OF E-FILED SIGNATURE

I, Arturo J. González am the ECF User whose ID and password are being used to file this Declaration. In compliance with General Order 45, X.B., I hereby attest that Ian M. Gore has concurred in this filing.

Dated: October 23, 2017

/s/ Arturo J. González

ARTURO J. GONZÁLEZ